

1 ANDERSON LAW
2 DAVID C. ANDERSON, State Bar # 83146
3 JONATHAN M. SHUGART, State Bar # 278221
4 50 Francisco Street, Suite 450
5 San Francisco, CA 94133
6 Telephone: (415) 395-9898
7 Facsimile: (415) 395-9839

8 Attorneys for Plaintiff
9 RHIANNIN SKEELS

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
DIVISION OF SAN FRANCISCO

11 RHIANNIN SKEELS,
12
13 Plaintiff,
14
15 vs.

No. CV-12-02175 TEH
Assigned to Judge Thelton E. Henderson

14 OFFICER KENDRICK PILEGAARD,
15 individually and in his capacity as a
16 Novato Police Department officer; CITY
17 OF NOVATO, CALIFORNIA; NOVATO
18 POLICE DEPARTMENT; CHIEF
19 JOSEPH KREINS, individually and in his
20 official capacity as Novato Police
21 Department Chief; VERONIQUE L. AU,
22 M.D.; SUTTER HEALTH; NOVATO
23 COMMUNITY HOSPITAL; COUNTY
24 OF MARIN, CALIFORNIA; MARIN
25 COUNTY SHERIFF'S OFFICE;
26 SHERIFF ROBERT T. DOYLE,
27 individually and in his capacity as Marin
28 County Sheriff; and DOES 1 through 100,
inclusive,

Defendants.

**JOINT REQUEST FOR ORDER OF
VOLUNTARY DISMISSAL OF
DEFENDANT VERONIQUE L. AU,
M.D. AND ~~PROPOSED~~ ORDER**

1 TO THE HONORABLE JUDGE OF THE ABOVE-ENTITLED COURT, THE
2 PARTIES AND THEIR ATTORNEYS OF RECORD:

3 On or around December 4, 2013, Plaintiff RHIANNIN SKEELS and Defendant
4 VERONIQUE L. AU, M.D. reached a settlement agreement in the above-titled matter under the
5 following terms and conditions: that Defendant AU will, in exchange for a dismissal with
6 prejudice of Defendant AU, waive any claim for costs and right to proceed with any action in
7 malicious prosecution against Plaintiff SKEELS, or her attorneys; both parties shall bear their
8 own costs and attorneys' fees associated with this litigation.

9 Plaintiff notes that Defendant VERONIQUE L. AU, M.D.'s Motion for Summary
10 Judgment is set for hearing in Department 2 of the above titled court on January 13, 2014 at
11 10:00 A.M. This motion should be taken off calendar subject to the court's order dismissing Dr.
12 AU as herein requested.

13 Plaintiff RHIANNIN SKEELS and Defendant VERONIQUE L. AU, M.D., by and
14 through their designated counsel, hereby Request an Order of Voluntary Dismissal pursuant to
15 Fed. Rules Civ. Pro. Rule 41(a)(2) of Defendant VERONIQUE L. AU, M.D. with prejudice.
16 The parties further request that the Order provide that VERONIQUE L. AU, M.D. waives any
17 claim for costs and right to proceed with any action in malicious prosecution against Plaintiff
18 SKEELS, or her attorneys, and that each party shall be responsible for its own costs and
19 attorneys' fees associated with this litigation.

20
21 Dated: December 5, 2013

ANDERSON LAW

22 /s/
23 DAVID C. ANDERSON
24 Attorney for Plaintiff Rhiannin Skeels

25 Dated: December 5, 2013

DONNELLY NELSON DEPOLO & MURRAY

26 /s/
27 THOMAS J. DONNELLY
28 Attorney for Defendant Veronique L. Au, M.D.

~~PROPOSED~~ ORDER OF VOLUNTARY DISMISSAL OF
DEFENDANT VERONIQUE AU, M.D.

The Joint Request for Order of Voluntary Dismissal of Plaintiff RHIANNIN SKEELS and Defendant VERONIQUE L. AU, M.D. pursuant to Fed. Rules Civ. Pro. Rule 41(a)(2) in the above titled action came before this court on this day. Finding good case therefor, it is hereby ORDERED that:

1. Defendant VERONIQUE L. AU, M.D. is dismissed with prejudice;
2. Defendant VERONIQUE L. AU, M.D. waives any claim for costs and right to proceed with any action in malicious prosecution against Plaintiff SKEELS, or her attorneys;
3. Each party shall be responsible for its own costs and attorneys' fees associated with this litigation.

Dated: 12/09, 2013

